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5 *Jiangtian Sun and Sun Timepiece Trade, LLC*

6
7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 HAYDEN KHO, Jr., individually, and
10 VICTORIA G. BELO, individually and

11 Plaintiffs,

12 v.

13 JIANGTIAN SUN, individually, and SUN
TIMEPIECE TRADE, LLC, a Nevada
Limited Liability Company; DOES 1 through
14 10, inclusive; DOES & ROES
CORPORATIONS ENTITIES 1 through 10
15 inclusive;

16 Defendants.
17

Case No. 2:19-cv-00596-JCM-CHW

**STIPULATION AND ORDER
EXTENDING TIME FOR PLAINTIFF TO
REPLY TO SPECIALLY APPEARING
DEFENDANTS JIANGTIAN SUN AND
SUN TIMEPIECE TRADE, LLC
MOTION TO DISMISS**

(PLAINTIFF'S FIRST REQUEST)

18 Plaintiffs HAYDEN KHO, JR., and VICTORIA BELO ("Plaintiffs") and Specially
19 Appearing Defendants Jiangtian Sun and Sun Timepiece Trade, LLC ("Specially Appearing
20 Defendants") by and through their respective counsel of record, hereby stipulate and agree, with
21 the Court's approval, as follows:

22 **RECITALS**

23 WHEREAS, Plaintiff filed a complaint in this action initiating Case No. 2:19-cv-00596-
24 JCM-CHW on April 8, 2019 (Doc. No. 1.);

25 WHEREAS, Specially Appearing Defendants' filed a Motion to Dismiss Complaint on
26 May 22, 2019 (Doc. 8), pursuant to stipulation and order to extend time for Defendants' to file
27 said responsive pleading (Doc. 6);
28

1 WHEREAS, Plaintiff's Reply in Opposition to Motion to Dismiss is due on June 5, 2019;

2 WHEREAS, Specially Appearing Defendants and Plaintiffs agree to allow Plaintiffs by
3 this stipulation and order up through June 19, 2019;

4 This is Plaintiffs' first request for an extension of time to respond to Specially Appearing
5 Defendants' responsive pleading in the above captioned case; this request from Plaintiffs are not
6 made for any improper purpose or for the purpose of delay or bad faith; Plaintiffs are requesting
7 the extension due to unavailability of Plaintiffs' Counsel from May 28, 2019 to June 19, 2019 for
8 a previously scheduled overseas trip.

9 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the parties, through
10 their counsel, as follows:

11 Plaintiffs shall file their response to Defendants' Motion to Dismiss by or on June 19,
12 2019.

13 **SO STIPULATED.**

14
15 DATED: June 3, 2019

The Thater Law Group, P.C.

16 By: /s/ M. Lani Esteban-Trinidad
17 M. LANI ESTEBAN-TRINIDAD
18 *Attorney for Plaintiffs*
Hayden Kho and Victoria G. Belo

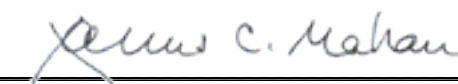
19
20 DATED: June 3, 2019

Enenstein Pham & Glass

21 By: /s/ Robert A. Rabbat
22 ROBERT A. RABBAT, ESQ.
23 *Attorney for Specially Appearing Defendants*
Jiangtian Sun a/k/a John Sun d/b/a as
24 Sun Timepiece Trade, LLC

25 **IT IS SO ORDERED:**

26 DATED: June 5, 2019

27 
28 UNITED STATES DISTRICT JUDGE

1 **PROOF OF SERVICE**

2 I hereby certify that on June 4, 2019, a copy of the foregoing document titled
3 **STIPULATION AND ORDER EXTENDING TIME FOR PLAINTIFF TO REPLY TO**
4 **SPECIALLY APPEARING DEFENDANTS JIANGTIAN SUN AND SUN TIMEPIECE**
5 **TRADE, LLC MOTION TO DISMISS (PLAINTIFF'S FIRST REQUEST)** was filed
6 electronically via the Court's CM/ECF system. The following parties will receive a Notice of
7 Electronic Filing (NEF) containing the foregoing document and may further access the same
8 through the Court's CM/ECF system.

9 Maile Lani Esteban-Trinidad
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Attorneys for Plaintiffs
Victoria G. Belo & Hayden Kho, Jr.

14 Executed on June 4, 2019 at Las Vegas, Nevada.

15 

16 _____
Michelle Choto